

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

ARTHUR LAMAR ADAMS AND  
MADISON TIMBER PROPERTIES,  
LLC

Defendants,

Civil Action No.  
3:18 –cv-252-CWR-FKB

**THE MISSISSIPPI SECRETARY OF STATE’S EMERGENCY  
MOTION RECOMMENDING A TEMPORARY RECEIVER**

On May 10, 2018, the Securities and Exchange Commission (the “SEC”) filed its Expedited Motion to Appoint Temporary Receiver. [Doc. 12]. On May 11, 2018, the Mississippi Secretary of State (the “Secretary”) filed his Motion to Intervene for the Limited Purpose of Opposing the SEC’s Expedited Motion to Appoint Temporary Receiver for the further limited purpose of recommending a second candidate. Having now been granted the right to intervene, the Secretary respectfully moves this Court to appoint Derek Henderson as the receiver in this matter, instead of the SEC’s proffered candidate, because Derek Henderson, a local lawyer who has served as a neutral fiduciary for over thirty (30) years at the federal and state levels, would better serve the Court and the estate herein than Kenneth Dante Murena, a Miami, Florida, lawyer who has been appointed receiver only one time.

This the 24<sup>th</sup> day of May, 2018.

Respectfully Submitted,

C. DELBERT HOSEMAN, JR., in his Official  
Capacity as MISSISSIPPI SECRETARY OF  
STATE

By His Attorneys,

MOCKBEE HALL & DRAKE, P.A.

BY: /s/ David W. Mockbee  
DAVID W. MOCKBEE, MSB #3396  
DAVID B. ELLIS, MSB #102926

MOCKBEE HALL & DRAKE, P.A.  
Capital Towers, Suite 1820  
125 South Congress Street  
Jackson, MS 39201  
(601) 353-0035 (phone)  
(601) 353-0045 (fax)  
[dmockbee@mhdllaw.com](mailto:dmockbee@mhdllaw.com)  
[dellis@mhdllaw.com](mailto:dellis@mhdllaw.com)

OF COUNSEL:

Jessica Leigh Long  
Assistant Secretary of State  
MSB #103316

Jeffrey L. Lee  
Senior Attorney  
MSB #103180

Office of the Mississippi Secretary of State  
Securities Division  
125 S. Congress Street  
Jackson, MS 39201  
(601) 359-1650 (phone)  
(601) 359-9070 (fax)

**CERTIFICATE OF SERVICE**

I, David W. Mockbee, do hereby certify that on this date I electronically filed the foregoing document with the Clerk of this Court using the ECF system, which sent notification of this filing to all counsel of record.

THIS the 24<sup>th</sup> day of May, 2018.

/s/ David W. Mockbee

DAVID W. MOCKBEE